

CABINET SHOPS AND WOOD REFINISHERS



SMALL BUSINESS ASSISTANCE PROGRAM

HOW AM I AFFECTED?

Under the authority of the Clean Air Act, the United States EPA, established national emission standards for hazardous air pollutants (NESHAPS) for wood furniture manufacturers on December 7, 1995. Many of the products used in this trade contain several of the 149 regulated volatile hazardous air pollutants, such as, toluene, xylene, methanol, methyl ethyl ketone, methyl isobutyl ketone, glycol ethers and formaldehyde. Cabinets shops and wood refinishers which produce small amounts of these air pollutants are classified by the federal standards as an area source wood furniture manufacturer. This fact sheet addresses area sources. If your shop exceeds the limits for an area source, as outlined below, it is considered a major source. A major source must meet more stringent requirements. Call the Small Business Assistance Program at 1-800-SBAP HLP or 1-800-722-7457 for further assistance.

TO QUALIFY AS AN AREA SOURCE:

Provisions:

- shop uses no more than 250 gallons in any one month period, of coating, gluing, cleaning and washoff material OR
- shop uses no more than 3,000 gallons of coating, gluing, cleaning and washoff materials per rolling 12 month period OR
- shop uses materials containing no more than 5 tons of any one hazardous air pollutant or no more than 12.5 tons of any combination of hazardous air pollutants per rolling 12 month period and at least 90% of the shop's emissions are associated with the manufacturing of wood furniture or wood furniture components

WHAT ARE MY REQUIREMENTS AS AN AREA SOURCE?

As an **area source**, you are required to keep records of the total gallons of coating, gluing, cleaning and washoff materials used each month. The monthly information you keep is used to create a 12 month rolling total usage record. These records must be kept on your premises along with copies of the certified product data sheets of these materials. Certified product data sheets are produced by and may be obtained from coating or adhesive suppliers or research and development laboratories. All records must be kept at your shop for at least 5 years.

Recordkeeping requirements begin December 7, 1998.

WHEN DOES A BUSINESS QUALIFY AS AN INCIDENTAL WOOD FURNITURE MANUFACTURER?

A business which is a **major air source** and is primarily engaged in manufacturing products other than wood furniture or wood furniture components may be classified as an **incidental wood furniture manufacturer** if the business uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components. The business must maintain purchase or usage records to support this claim.

In Conjunction with the Small Development Business Centers

WHAT IF I EXCEED THE AREA SOURCE LIMITS?

If you exceed the **area source** limits, you must obtain an air permit. You must also meet more stringent requirements as a **major source**. Please contact the **Small Business Assistance Program** for more information by calling **1-800-722-7457**.

SHOULD I BE CONCERNED ABOUT HAZARDOUS WASTE?

Many of the same chemicals that are identified as volatile hazardous air pollutants are also hazardous waste when they are discarded. Hazardous waste is classified by characteristics (ignitable, toxic, corrosive, and reactive) or by listed chemical name. When disposed of, products containing 10% or more by volume of methanol or xylene are regulated as listed hazardous wastes. Products having 10% or more by volume of methanol ethyl ketone are regulated as both an ignitable and toxic waste. Many of the varnishes, sealers and stains may also contain these chemicals. Also, a hazardous waste may be a result of sludges from stripping or from discarded shop rags. Companies that formulate wood finishing products are required by federal law to provide the users with material safety data sheets (MSDS).

The MSDS gives chemical characteristics and handling information about the product. To learn more on how to identify, manage and dispose of your hazardous waste, contact Hazardous Waste Management at 904/488-0300.



POLLUTION PREVENTION PRACTICES

Pollution prevention practices include the elimination, waste minimization or on-site recycling of wood finishing materials. Many of these materials have been reformulated to be either water based or contain a reduced volatile organic compounds (VOC) content. If the work requires VOC based products, plan to buy only the amount needed for the job and reduce your consumption as much as possible.

Technology has developed spray equipment that performs increased transfer efficiency over conventional air spraying. High volume low pressure (HVLP) and electrostatic systems are available. The SBAP keeps a library on wood refinishing topics including pollution prevention practices.

FOR MORE INFORMATION

WOOD FURNITURE MFG. EPA has developed several booklets on the wood furniture and finishing industry, such as *Profile of the Wood Furniture and Fixture Industry* and the

companion teleconference booklet, Clean Air Compliance for Wood Furniture Manufacturers. EPA has written guidelines for major sources, Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations. This information may be obtained through EPA's homepage, www.epa.gov. A paper copy is also available by calling the Small Business Assistance Program at 1-800-SBAP HLP or 1-800-722-7457.